



Phone: (212) 885-5152
Fax: (917) 332-3858
Email: WBennett@BlankRome.com

November 9, 2015

Via ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 1030
New York, New York 10007

Re: *D'Amico Dry Limited v. Primera Maritime (Hellas) Limited, et al.*
Docket No. 1:09-cv-07840-JGK

Dear Judge Koeltl:

As you know we represent the alleged alter ego defendants in the referenced matter. Unfortunately an issue arose after Friday's conference which requires our having to write to you.

After we left the courtroom Mr. Reilly and I advised Mr. Tisdale, for planning purposes, that the deposition of Mr. Bonasso would likely take longer than 7 hours. Mr. Tisdale responded that because the rule regarding deposition time only permits 7 hours he would not allow the deposition of Mr. Bonasso to go beyond 7 hours without a court order. Fed.R.C.P 30(d)(1) states that a court must allow additional time if needed to fairly examine the deponent or if there is a circumstance which delays the examination. Here, there are several different issues Mr. Reilly and I need to question Mr. Bonasso about and the length of the deposition will be delayed significantly because, despite Mr. Bonasso previously testifying in English, Mr. Tisdale requested an Italian interpreter be utilized. Accordingly, we respectfully request that the Court order Mr. Bonasso to be made available for deposition for no more than 12 hours.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William R. Bennett, III".

William R. Bennett, III



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cc: Thomas Tisdale, Esq.
Tisdale Law Office LLC
10 Spruce Street
Southport, CT 06890

John J. Reilly, Esq.
Squire Patton Boggs (US) LLP
30 Rockefeller Plaza
New York, New York 10112